

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2019-9-E

In the Matter of:)	
)	
South Carolina Electric & Gas)	MOTION FOR EXTENSION OF TIME TO
Company's Integrated Resource Plan)	FILE COMMENTS
(IRP))	
)	
)	

The South Carolina Coastal Conservation League and Southern Alliance for Clean Energy (collectively, "Petitioners") hereby move the South Carolina Public Service Commission ("Commission"), pursuant to §103-829 of the South Carolina Code of Regulations, to extend the time to file written comments in the above-captioned docket concerning South Carolina Electric & Gas Company's ("SCE&G") 2019 Integrated Resource Plan ("IRP"). In support of this motion, Petitioners state as follows:

1. Pursuant to Commission Order No. 2012-96 on SCE&G's 2011 IRP, "[a]ny Petitions to Intervene or written public comments must be filed within 30 days after the IRP is posted on the Commission website."
2. On February 8, 2019, SCE&G filed its 2018 IRP, which was entered in the above-captioned docket.
3. On March 8, 2019 Petitioners filed a petition to intervene in the above-captioned docket, in which their interests and those of their members in this proceeding were provided. On March 20, 2019 the Commission granted Petitioners' petition to intervene. Docket No. 2018-9-E, Order No. 2018-201. The 30-day period running from that date would make Petitioners' comments due April 19, 2019.

4. Petitioners intend to submit written comments on SCE&G's IRP to address their interests and those of their members in this proceeding, and to advocate for integrated resource planning that evaluates resource alternatives and results in a low-cost, reliable portfolio of supply- and demand-side resources with minimal harmful environmental impacts and costs to ratepayers.

5. Petitioners served a data request on SCE&G on March 26, 2019, and SCE&G responded to that request on April 15, 2018. In light of this response date, the complexity of integrated resource planning, and the issues raised by SCE&G's IRP, Petitioners believe that the current deadline will not allow sufficient time for careful analysis based on the information presented in and/or underlying the IRP, and thoughtful preparation of comments. Accordingly, Petitioners respectfully request a 30-day extension of the comment deadline until May 17, 2019.

6. Petitioners note that an extension was granted by the Hearing Officer in the Duke Energy Progress and Duke Energy Carolinas IRP proceedings this year (Dockets 2018-8-E and 2018-10-E) in Order 2019-10-H, issued February 5, 2019.

7. Counsel for SCE&G, the South Carolina Office of Regulatory Staff, and the Solar Business Alliance have indicated that they do not object to the requested extension.

8. Petitioners' authorized representative in the filing of this petition is:

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WHEREFORE, Petitioners pray that they be granted an extension of time until May 17, 2019 to submit written comments in this matter.

Respectfully submitted this 17th day of April, 2019.

/s/ J. Blanding Holman IV
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*Attorney for South Carolina Coastal
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Alliance for Clean Energy*

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:)	
)	
South Carolina Electric & Gas)	CERTIFICATE OF SERVICE
Company's Integrated Resource Plan)	
(IRP))	
)	
)	

I certify that the following persons have been served with one (1) copy of
Petitioners' Motion for Extension of Time to File Comments by electronic mail at the
addresses set forth below:

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This the 17th day of April, 2019.

/s/ Emily Selden